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July 23, 2025

Honorable Edgardo Ramos  
United States District Court  
40 Foley Square, Courtroom 619  
New York, NY 10007

Re: *Kandeh v. Nordvpn S.A. et al.*, Case No. 1:25-cv-02571-ER

Dear Judge Ramos:

In accordance with Rule 1(E) of the Court's Individual Practices, Defendants Nordvpn S.A., Tefincom S.A., and NordSec B.V. write with Plaintiff Lanzy Kandeh's consent to request that the Court adjourn the July 25, 2025, pre-motion conference concerning Defendants' anticipated motion to dismiss and stay proceedings in this case. The parties have entered mediation in hopes of resolving this case and other cases pending against Defendants. The parties held their first mediation session on July 15, 2025, and have scheduled a follow-up mediation session for September 2, 2025. Given the potential resolution of this matter, the parties seek an adjournment until after the mediation in the interest of judicial economy.

This is Defendants' first request to adjourn the pre-motion conference and stay proceedings, and there are no other scheduled dates that will be affected if this request is granted.

Thank you for considering this request.

Sincerely,

FENWICK & WEST LLP

*s/ Jedediah Wakefield*

Jedediah Wakefield

## MEMO ENDORSED

The proceedings are stayed. The parties are directed to report to the Court as soon as the meditation process is concluded.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Edgardo Ramos".

Edgardo Ramos, U.S.D.J.

Dated: July 24, 2025

New York, New York